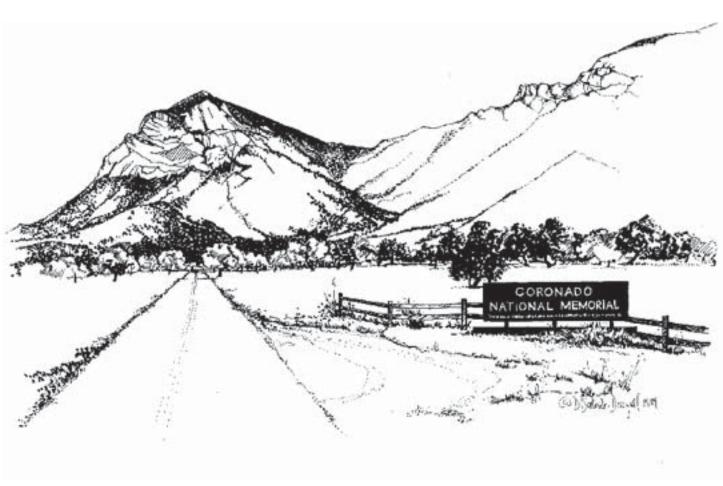
# CONSULTATION AND COORDINATION





### INVOLVEMENT OF PUBLIC AND OTHER AGENCIES

### **PUBLIC INVOLVEMENT**

This General Management Plan / Environmental Impact Statement for Coronado National Memorial represents thoughts presented by the National Park Service, Native American groups, and the public. Consultation and coordination among the agencies and the public were vitally important throughout the planning process. The public had two primary avenues by which it participated during the development of the plan: participation in public meetings and responses to newsletters.

Public meetings and newsletters were used to keep the public informed about and involved in the planning process for Coronado National Memorial. A mailing list was compiled that consisted of members of governmental agencies, nongovernmental groups, businesses, legislators, local governments, and interested citizens.

The notice of intent to prepare an environmental impact statement was published in the *Federal Register* on February 22, 2000. A newsletter issued in March 2000 described the planning effort. Public meetings in Sierra Vista and Bisbee in April 2000 were attended by 30 people. The National Park Service also met with city, county, and federal agencies. The National Park Service received several comments about the meetings and newsletter, and a number of these comments were incorporated into the issues for the plan.

A second newsletter distributed in March 2001 described draft alternative concepts for managing the national memorial. A total of 22 electronic and mailed comments were received in response to that newsletter. Several letters favored making only minimal changes to the current management of the memorial. Some people expressed concern about overdevelopment. Some people commented in favor of the memorial offering

more educational opportunities for visitors and facilities to support these activities; others said they would like more trails in the national memorial, and some said there should be less grazing in the memorial.

A third newsletter issued in June 2001 described alternatives for grazing at Coronado National Memorial and asked if people thought any of the memorial was suitable for wilderness designation. A wide range of opinions was received in 38 electronic and mailed comments. Some people wrote in favor of allowing grazing in whole or in part; others commented in favor of eliminating all grazing from the memorial. Some commenters said they favored formal wilderness designations; others wrote to oppose any wilderness designation.

A fourth newsletter published in February 2001 explained the National Park Service's determination regarding wilderness and the possible range of actions on grazing.

### CONSULTATION

### **Section 106 Consultation**

Agencies that have direct or indirect jurisdiction over historic properties are required by section 106 of the National Historic Preservation Act of 1966, as amended (16 USC 270, et seq.), to take into account the effect of any undertaking on properties eligible for the National Register of Historic Places. Such agencies also must allow the Advisory Council on Historic Preservation an opportunity to comment. To meet the requirements of 36 CFR 800, the National Park Service sent letters to the Arizona state historic preservation office and the Advisory Council on Historic Preservation on March 7, 2000, inviting their participation in the planning process. Both offices were sent all the newsletters with a request for comments.

Representatives from the Arizona state historic preservation office visited Coronado National Memorial on June 6, 2001, and were briefed on alternatives for the *Draft General Management Plan / Environmental Impact Statement*. The sites visited were the Montezuma Ranch, Montezuma Pass, the visitor center, the housing area, and the picnic area. The representatives of that office indicated that for the purposes of this plan, the visitor center should be considered eligible for listing on the national register, but that the other sites would require further evaluation.

### **Consultation with American Indians**

Letters were sent to the following American Indian groups on March 22, 2000, to invite their participation in the planning process:

Ak-chin Indian Community
Fort McDowell Mojave- Apache Indian
Community
Fort Sill Apache Tribe of Oklahoma
Hopi Tribe
Mescalero Apache Tribe
Pascua Yaqui Tribe of Arizona
Pueblo of Zuni
Salt River Pima- Maricopa Indian Community
San Carlos Apache Tribe
Tohono O'odham Nation
Tonto Apache Tribe
White Mountain Apache Tribe
Yavapai- Apache Tribe

The tribes were briefed on the scope of the planning project and the preliminary alternatives by newsletters and follow- up telephone calls soliciting comments.

Comments included a letter from the Hopi Tribe and oral comments from other tribes.

These comments included expressions of concern that recreation not be overemphasized at the memorial and that any traditional cultural properties in the area be respected. Conversations have been continuing throughout the planning process to inform

the tribes about the progress of the plan and identify how and to what extent they would like to be involved. The listed tribes were sent a copy of the *Draft General Management Plan / Environmental Impact Statement*. This was followed by telephone calls to the tribes. There were no comments from the tribes at this time.

## **Consultation Regarding Threatened or Endangered Species**

Consultation with the U.S. Fish and Wildlife Service began in March 2000, when the National Park Service requested a list of endangered and threatened species that might be found in or near Coronado National Memorial. The U.S. Fish and Wildlife Service responded on March 27, 2000 with a list of the endangered or threatened species that might be found there. This response is included in appendix F.

### **Consultation with Other Agencies**

Representatives of the national memorial met on April 4, 2000, with and representatives of the United State Border Patrol, Coronado National Forest, Fort Huachuca, the Bureau of Land Management, and the Cochise County Planning Department. The scope and issue of the plan were discussed, and these agencies were placed on the mailing list so that they would receive all newsletters for comment.

## PUBLISHING THE DRAFT DOCUMENT

A notice of availability of the draft document was published in the *Federal Register* on August 6, 2003 (FR Vol. 68, No. 151). About 500 copies of the draft were distributed to government agencies, public interest groups, and individuals. In addition, the complete text of the *Draft General Management Plan/Environmental Impact Statement* was posted on the NPS Web site.

## AGENCIES AND ORGANIZATIONS RECEIVING COPIES OF THIS DOCUMENT

### **International Agencies**

International Boundary and Water Commission\*

### **Federal Officials and Agencies**

Advisory Council on Historic Preservation\* Fort Huachuca

U.S. Army Corps of Engineers

U.S. Department of Agriculture Forest Service

**Natural Resource Conservation Service** 

U.S. Border Patrol

U.S. Department of the Interior Bureau of Land Management U.S. Fish and Wildlife Service\*

U.S. Environmental Protection Agency\*

### **State Officials and Agencies**

Governor Jane Dee Hull
Senator Jon Kyl
Senator John McCain
Representative Jim Kolbe
Arizona Department of Environmental
Quality
Arizona Department of Parks and Tourism
Arizona Game and Fish Commission
Arizona Highway and Transportation
Department

Arizona State Historic Preservation Office New Mexico Highlands University\*

### **Local Agencies**

Cochise County, Planning Department\*

### **Organizations**

American Lands Alliance\*

### **American Indians**

Ak- chin Indian Community
Fort McDowell Mohave- Apache Indian
Community
Fort Sill Apache Tribe of Oklahoma
Hopi Tribe
Mescalero Apache Tribe
Pascua Yaqui Tribe of Arizona
Pueblo of Zuni
Salt River Pima- Maricopa Indian Community
San Carlos Apache Tribe
Tohono O'odham Nation
Tonto Apache Tribe
White Mountain Apache Tribe
Yavapai- Apache Tribe

### **Individuals**

Curt Bradley, Martin Taylor, Tim Lengerich, Alexander "Sandy" Kunzer, Steve Saway\* Jeff Burgess\* Dieter Kamm\* Alice Moffett\* Warren and Barbara North\*

<sup>\*</sup>An asterisk denotes those who commented on the draft plan.

### REVIEW AND COMMENTS ON THE DRAFT DOCUMENT

This section contains a summary of comments received through a public meeting, letters, and e-mail after the *Draft General Management Plan/Environmental Impact Statement* for Coronado National Memorial was released on August 6, 2003. The National Park Service considered all written and oral comments according to the requirements of 40 CFR 1503.

#### **COMMENTS**

A public meeting was held in September 2003 at Sierra Vista. There were four people at this meeting. In general, the comments at the public meetings sought clarification of the various alternatives with some discussion on the pros and cons of each alternative. Other comments were in regard to why the memorial would not allow camping.

During the comment period (August 6 through October 6, 2003), 10 comment letters and six electronic responses were received commenting on the draft from governing bodies, government agencies, organized interest groups, and individuals. All comments are reproduced on the following pages. The comments, in general, expressed support for either or both the preferred alternative or alternative C. A number of comments supported the proposal to end grazing, saying that both the visitor experience and natural resources would benefit. Some comments suggested that the natural resource benefits could be greater than predicted in the environmental consequences section of the draft document. The following are NPS response to substantive comments and suggestions for modifications of the draft plan. A substantive comment requiring response must meet one of the following criteria found in the regulations that implemented the National Environmental Policy Act (section 1503.4.1-5):

- (1) Modify alternatives including the proposed action.
- (2) Develop and evaluate alternatives not previously given serious consideration by the agency.
- (3) Supplement, improve, or modify its analysis.
- (4) Make factual corrections.
- (5) Explain why comments do not warrant further agency responses, citing the sources, authorities, or reasons which support the agency's position and, if appropriate, indicate those circumstances which would trigger agency reappraisal or further response.

## Comment from the U.S. Fish and Wildlife Service

During the public comment period, the park followed up the transmittal of the *Draft General Management Plan/Environmental Impact Statement* to the U.S. Fish and Wildlife Service with a telephone conversation. That agency had no comment at that time on the draft plan and may send the National Park Service a letter with that finding.

### **Comment from American Lands Alliance**

"We are disappointed that alternative B does not include a goal of determining the 'feasibility of reintroducing native plants and animals in the memorial that were present at the time of the Coronado Expedition.'"

**Response:** Alternative B seeks to improve both visitor experience and natural resource habitat while balancing these improvements with the cost of any new programs. Under alternative B the memorial would continue to cooperate with other agencies such as Arizona Game and Fish Department and U.S.

Fish and Wildlife Service on local reintroduction and recovery efforts.

## Comment from the Center for Biological Diversity

"Coronado undoubtedly also saw an abundance of wild game. Restoring wild game to pristine levels should likewise be considered part of the memorial's mission."

Response: See above comment. Also, the phasing out of grazing in alternative B will result in some wildlife species having more food and cover. Grasslands habitat for birds and small mammals as well as the animals that prey on them will be improved and may result in increased species diversity. Additional discussion can be found in the environmental consequences section of the plan on how alternative B would affect wildlife habitat and populations.

### **Comment from Steve Saway**

The memorial currently has no area for designated overnight camping.

**Response:** As stated on page 69 in the draft document, adequate camping for memorial visitors is available outside the national memorial and facilities in the memorial are not necessary to accomplish the memorial's mission.

## Comments on Distribution of the Draft Document

A number of people at the public meeting and some letters commented that National Park Service should reduce the number of documents produced and the cost of mailing the documents.

**Response:** The National Park Service sent out a postcard to people on the mailing list for the *Final General Management Plan/Environmental Impact Statement* offering the final plan in a printed version, on a compact disk as a PDF file, or as an electronic version that could be downloaded from the NPS planning website at <a href="http://planning.nps.gov/">http://planning.nps.gov/</a> plans.cfm>. Also a few printed documents were available at the park's visitor center. This helped reduce the number of documents printed and mailed.

### **Comments on NPS Operations**

Several comments were received that made recommendations for various park operational programs. For example, one commenter suggested the park have recycling bins at the visitor center. Although many of these suggestions may have considerable merit, they are too detailed to be included in a general management plan, which is intended to be a long-range, general guidance document. However, these suggestions will be kept and considered as the park moves into more detailed implementation planning. Other comments on NPS operations that were too detailed for a general management plan included the following:

Interpretive activities should look at ways to involve the Hispanic community.

New pullouts and waysides (these are discussed in the preferred alternative) should be provided with garbage cans.

The National Park Service should continue to look at ways to enhance interpretation of the Coronado *entrada* and the Spanish Colonial Period.

The National Park Service should contact the International Boundary and Water Commission if any work is planned on International Boundary Monuments 100, 101, and 102.





### INTERNATIONAL BOUNDARY AND WATER COMMISSION UNITED STATES AND MEXICO

AUG 1 8 2003

RECEIVED

AUG 2 0 2003

Superintendent Coronado National Memorial 4101 East Montezuma Canyon Road Hereford, Arizona 85615

Dear Superintendent:

The United States Section, International Boundary and Water Commission (USIBWC), provides review comments on the Draft General Management Plan/Environmental Impact Statement received August 5, 2003. The document is on management alternatives and potential impacts to natural and cultural resources at the memorial.

International Boundary and Water Commission, United States and Mexico (IBWC), oversees application of numerous boundary and water treaties and related agreements between the Governments of the United States and Mexico. IBWC ensures permanence of the international boundary monumentation along the land boundary located west of El Paso, Texas, including periodic inspection, repair/replacement and re-survey. International agreements specify that activities will not obstruct access to monuments and line-of-sight between them. It is recommended that United States (U.S.) projects, such as border fences and associated works (i.e., excavations, foundations) be on an alignment that is offset a minimum of two feet from the international boundary. Typically, a 10-foot offset and provisions for access are required near the international boundary monuments. Fencing near the international boundary may not reflect the international boundary. The IBWC typically does not place fencing on the boundary. The U.S. Government gives limited technical investigative authority to USIBWC. Based on statutes; under this authority, USIBWC asks that development in the United States near the international land boundary not alter existing surface drainage patterns and characteristics.

Based on National Park Service information, the proposed activities will not limit our access, and will not result in transboundary drainage or pollution impacts. This determination considers USIBWC operation and maintenance activities, and line-of-sight between the monuments. All workers and equipment must remain in the United States. On page 197, regarding International Boundary Monuments 100, 101, and 102 determined eligible for nomination to the National Register of Historic Places, contact the following office two weeks before the start of any work at monuments: Mr. Stephen Tencza, Project Manager, USIBWC Nogales Field Office, 865 Rio Rico Industrial Park, Rio Rico AZ 85648, Phone: (520) 281-1832. International Boundary Monuments

The Commons, Building C, Suite 310 • 4171 N. Mesa Street • El Paso, Texas 79902 (915) 832-4100 • (FAX) (915) 832-4190 • http://www.ibwc.state.gov

are half in the United States and half in Mexico. In accordance with international treaties and United States Federal Law, the IBWC maintains full control of International Boundary Monuments. On page 233, add the USIBWC to the list of federal agencies that received the document.

If you have questions, please call Environmental Protection Specialist Steve Fox at (915) 832-4736.

Sincerely,

for Sylvia A. Waggoner

Division Engineer
Environmental Management Division



SNPO- 2000 - 575 (16949)

## United States Department of the Interior

W .

NATIONAL PARK SERVICE Coronado National Memorial 4101 East Montezuma Canyon Road Hereford, AZ 85615

INREPLYREPERTO:
CORO (H-4217)

August 7, 2003

Mr. James Garrison State Historic Preservation Officer Arizona State Parks 1300 West Washington Phoenix, AZ 85007

Dear Mr. Garrison:

CONCUR PROCESS
PROPOSED
REPOSED
1256703

ARIZONA STATE HISTORIC PRESERVATION OFFICER
CAR ARIZONA STATE PARKS BOARD

The National Park Service continues to work toward the completion and implementation of a General Management Plan/Environmental Impact Statement (GMP/EIS) for Coronado National Memorial in Cochise County, Arizona. A copy of the public review draft of the GMP/EIS is being submitted for your review and formal comment under stipulation VI.E of the 1995 Programmatic Agreement. We would like to present those undertakings subject to review under Section 106 consultation.

The draft document contains five alternatives.

Alternative A reflects ongoing actions at the park and serves as a basis for comparing the other alternatives and knowing why certain changes may be advisable. Current laws, policies, and guidelines would guide natural and cultural resource management actions. Interpretation and visitor services remain limited, and any development that is not tied to an approved plan would be designed to be temporary and reversible. There would be limited, if any, changes in the management of the park. Coordination with agencies and other groups would continue.

<u>Alternative B</u> is the National Park Service's preferred alternative. It would enhance educational and recreational opportunities while ensuring public understanding of the national memorial's resources. Educational and interpretive goals would be emphasized, and the staff would seek new ways to foster public appreciation of the memorial's resources.

Grazing in the national memorial would be discontinued, and the abandoned power line along the road to Montezuma Pass would be removed and revegetated with native plant species. All existing trails would be retained, and four new trails developed along with a new group picnic site and additional parking spaces for four buses or recreation vehicles.

The memorial would develop and update interpretation for the trail from Montezuma Pass to Coronado Peak, the trail to Coronado Cave, and the grasslands north and south of the main road.

Montesama Ranch would be evaluated for national register eligibility, and any features found eligible would be documented according to procedures developed through consultation with the Arizona state historic preservation office. Then all structures would be removed, the weat's natural contours would be restored, and native species would be used to revegetate the area. A trail accessible to people with disabilities would be developed in the grasslands north of the extrance, using part of the windmill road. The memorial's visitor center would be rehabilitated and offer updated interpretation. Interpretation would be available at Montezona Pass. More pullouts and waysides would be developed along the main road. An annex behind the visitor center would contain additional office space and shrage, along with a multipurpose room. A shuttle system would be developed between the visitor center and Montezona Pass. Alon the memorial would work toward conting an offsite cultural featival to celebrate various associated cultures, emphasizing the historical aspects of the Commands Expedition. A new four-unit structure might be built to home temporary employees. Vegetation would access all development from the road.

Alternative G would enterpe the communities of the manualitie estimate and natural resources for fators generations. Interpretation, the production would be substantial, interpretation, interpretation, interpretation, and the contracts program would be atomic these products.

The abundaned powerfine along the road to Montezuma Para would be removed and revegetated with native plant speaker. Studies would be done to determine the feasibility of reintroducing native plants and animals in the memorial that were present at the time of the Coronado Expedition. Grazing would be eliminated from the memorial. The Montesuma Ranch would be evaluated for national register eligibility, then the staff would work toward removing the structures to improve the views. If attractures or enlimit improve were then eligible, the staff would consult with the Arisona state historic preservation office to determine what features could be removed or documented and then removed. The goal would be to remove as many of these features as possible, testore the area's natural contours, and revegetate it. Abandoned roads would be restored to minute contours and revegetated. Intensive interpretation would be offered in the Montezuma Para area and along the Coronade Peak and to Coronado Cave trails.

The interior of the visitor center would be remodeled to make more space for interpretation. The building would be evaluated for its eligibility for national register listing, and my work would be planned to protect the contributing features. The interpretive trail near the visitor center would be made accombile for people with dischilities.

Some staff positions would be relocated in adequate space outside, but near, the measural to make room for visitors to peak at the visitor center. The plante area and its access road would be retained, with parking added nearby for four buses or remestional vehicles. The dist storage area on the road to Moutezama Pass would be removed, and that such, along with the fourier fleats grounds and social trails, would be removed to natural contours and revegetated. A new four-unit structure might be built to house temporary employees. Vegetation would screen all development from the road.

Strong emphasis would be placed on reaching beyond the memorial's boundaries to improve public understanding of the national memorial. The staff would join forces with verious groups to tell the memorial's story. Interpretive programs would be developed with Mexican groups, and activities would support Mexican and American methods and caltural resources.

Alternative D would be to develop a fuller international experience for visitors by finding new ways for the public to appreciate and understand the international aspects of the memorial.

The abandoned power line along the Montezuma Pass road would be removed and the area revegetated with native species. Abandoned roads would be restored to natural contours and revegetated. Grazing would not be permitted in the Montezuma allotment. Interpretive media would be added and update on the trail from Montezuma Pass to Coronado Peak, the trail to Coronado Cave, and the grasslands north of the main road. A new interpretive trail would be developed north of the main road in the grasslands, possibly using the windmill road, but not going into the Joe's Spring allotment.

East Forest Lane would be upgraded to two lanes, and a new structure would be built at the end of that road to offer views into Mexico. In this commemorative feature, which could become a main attraction of the memorial, interpretive media would foster appreciation of the Coronado Expedition, encouraging international amity. An educational center with space for staff offices built in the Montezuma Ranch area would be designed to blend into the environment, with the surrounding area landscaped so that it would not detract from the views from Coronado Peak. The Montezuma Ranch structures would be evaluated for national register eligibility, and any found eligible might be adaptively used as part of the educational center (with consultation with the Arizona state historic preservation office). The structures found ineligible would be demolished.

The views from Montezuma Pass would be preserved, with the roads to the educational center and the commemorative feature designed to minimize harm to the vista. The visitor center would be expanded and rehabilitated, with updated interpretation and more office and storage space. Interpretive themes would relate to the memorial's international aspects.

The interpretive trail at the visitor center would be removed. The visitor center would be evaluated for national register eligibility, and any work would be planned to protect the contributing features. More parking for visitors and NPS staff would be added; some could be in the present picnic area. The road to the picnic area would be upgraded and picnic sites added. A shuttle system would take visitors to and from Montezuma Pass, where the visitor shelter would be converted into a minimal contact station (staffed at peak times) and a sheltered shuttle stop. A new four-unit structure might be built to house temporary employees and others. All development would be screened from the road by vegetation.

The memorial would explore the feasibility of sponsoring Coronado-related events at various universities to promote international understanding. These events might include onsite and offsite lectures and cultural activities.

Alternative E would offer an enhanced experience for visitors while creating a more sustainable national memorial, with the hope of educating the public about the significance of the Coronado Expedition. A new visitor/education center would be created, and a new interpretive trail would be developed.

The abandoned power line along the road to Montezuma Pass would be removed and the area revegetated with native species. Grazing in the Joe's Spring allotment would be ended. East Forest Lane would continue to be used for NPS operations and as an access road to the Montezuma grazing allotment. The Montezuma Ranch would be evaluated for national register eligibility, and any features found eligible would be documented according to procedures recommended through consultation with the Arizona state historic preservation office. Then all structures would be removed, and it would be revegetated with native species. Interpretive media would be developed and updated for the trail from Montezuma Pass to Coronado Peak, the trail to Coronado Cave, and the grasslands north of the main road.

A new visitor/education center, which would be about 1.2 miles west of the east entrance. A trail would be developed at that center to interpret the grasslands, and another trail would be created between the current visitor center and the new visitor and education center. From the new center, visitors would have panoramic views of the San Pedro River Valley and the United States-Mexico border. These views would add to the staff's ability to tell the human and natural stories significant to Coronado National Memorial. The principles of sustainable design would be used to create this building typical of the Spanish colonial period, which would blend into the environment as much as possible.

The present visitor center, which may be eligible for national register listing, would be converted into administrative offices. It would be evaluated for national register eligibility, and any work done on the building would be planned to protect the eligible features. The main road, trailheads, parking, picnic area, and restrooms would be unchanged, with social trails revegetated. The windmill road would be made into a two-lane paved road, with the alignment changed slightly to give access to the visitor/education center. A shuttle system would run between the new visitor center, the old visitor center, and Montezuma Pass, with interpretation offered aboard the shuttles. The visitor shelter at Montezuma Pass would be converted into a minimal contact station and sheltered shuttle stop. A four-unit structure might be added to house temporary employees and others. All development would be screened from the road be vegetation.

The memorial would work with groups to tell the memorial's stories and reach beyond its boundaries. Partnerships would be created with local schools, the U.S. Forest Service, the Bureau of Land Management, and others, and interpretive programs would be developed in conjunction with Mexican groups.

Under the terms of VI.E of the 1995 Programmatic Agreement among the National Park Service, the Advisory Council on Historic Preservation, and the National Conference of State Historic Preservation Officers, the National Park Service, "in consultation with the SHPO, will make a determination about which undertakings are programmatic exclusions under IV. A and B, and all other undertakings, potential effects on those resources to seek review and comment under 36 CFR 800.4-6 during the plan review process."

Proposed undertakings for Coronado National Memorial are discussed in the enclosed *Draft, General Management Plan, Environmental Impact Statement for Coronado National Memorial* on page 243. The action and compliance requirements as proposed by the National Park Service are listed below:

Action	Compliance Requirement		
Rehabilitate Visitor Center	Further SHPO review necessary		
Construct Visitor Center Annex	No further SHPO review unless National Register of Historic Places archeological sites are impacted by construction or location would impact potential cultural landscape.		
Develop Trails and Wayside Exhibits	No further SHPO review necessary.		
Demolish Montezuma Ranch structures	No further SHPO review unless ranch is determined eligible for the National Register of Historic Places.		
Upgrade facilities at Montezuma Pass	No further SHPO review necessary.		
Rehabilitation work in housing area	Further SHPO review necessary.		

Your comments and concerns are important in determining the future of this national park, and we would very much appreciate having the benefit of your comments before we move on to the next stage of the planning process. Following the public review period, a summary and analysis of comments will be prepared and used by the National Park Service in selecting the final plan that will be implemented. A final GMP/EIS will be prepared and distributed.

Thank you for your participation in the General Management Plan process here at Coronado National Memorial. We look forward to receiving your comments regarding the above determinations. Please direct any oral comments or questions to John Paige (303) 969-2356. We would appreciate any written comments by October 6, 2003. They should be sent to Superintendent, Coronado National Memorial, 4101 East Montezuma Canyon Road, Hereford, Arizona 85615.

Sincerely,

Dale Thompson Superintendent



### UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

### REGION IX 75 Hawthome Street San Francisco, CA 94105-2901

September 16, 2003

Dale Thompson, Superintendent Coronado National Memorial 4101 East Montezuma Canyon Road Hereford, AZ 85615

Subject: Coronado National Memorial Draft General Management Plan/Environmental Impact Statement (Draft EIS), Arizona [CEQ #030368]

Rating: LO - Lack of Objections

Dear Superintendent Thompson:

The U.S. Environmental Protection Agency (EPA) has reviewed the above referenced document. Our review and comments are provided pursuant to the National Environmental Policy Act (NEPA), the Council on Environmental Quality's NEPA Implementation Regulations at 40 CFR 1500-1508, and Section 309 of the Clean Air Act.

The Draft EIS evaluates five alternatives for management of Coronado National Memorial over the next 15 to 20 years. The preferred alternative is also the environmentally preferable alternative. Based on our review, we have rated this Draft EIS as LO -- Lack of Objections (see enclosed "Summary of Rating Definitions").

We appreciate the opportunity to review this Draft EIS and request a copy of the Final EIS when it is filed with our Washington, D.C. office. If you have any questions, please call me at (415) 972-3854, or have your staff call Jeanne Geselbracht at (415) 972-3853.

Sincerely,

Lisa B. Hanf, Manager Federal Activities Office

004215

Enclosure: "Summary of Rating Definitions"

Printed on Recycled Paper



### COCHISE COUNTY PLANNING DEPARTMENT

1415 Melody Lane, Bisbee, Arizona 85603

(520) 432-9240 Fax 432-9278

James E. Vlahovich, Director

August 11, 2003

Mr. Dale Thompson, Superintendent National Park Service Coronado National Memorial 4101 E. Montezuma Canyon Rd. Hereford, Arizona 85615

Subject: Draft General Management Plan

Dear Superintendent Thompson:

Thank you for the opportunity to review the Draft General Management Plan and EIS for the Coronado National Memorial. It is evident that a considerable amount of time and effort was put into developing and evaluating the range of alternatives presented in this draft.

The Planning Department commends the Service for recognizing and considering the lands adjacent to the Memorial as appropriate for low-density development as designated in the *Southern San Pedro Valley Area Plan* (page 28 of the Draft GMP). This plan was developed by local community members, including the National Park Service, and was adopted in 2001 by the County Board of Supervisors.

The Service's preferred Alternative B, Enhance Opportunities While Protecting Resources, appears to be consistent with the *Southern San Pedro Valley Area Plan* and the current character of the area. The alternative, with its increased emphasis on education/interpretation and resource protection, would not seem to dramatically increase traffic to the memorial, nor result in increased commercial activity outside of the memorial's boundaries, as your assessment states on pages 27 and 28. However, if any of the alternatives did result in a significant increase in visitation, the *Southern San Pedro Valley Area Plan* has designated areas no more than 7 miles from the memorial's boundaries appropriate for commercial development that may accommodate the need for visitor services.

Thank you again for the opportunity to comment on this draft.

Sincerely,

Mark B. Apel Senior Planner

Xc:

James E. Vlahovich, Director

Central Files

Your County Questions Answered

www.cochisecounty.com

### NATIONAL PUBLIC LANDS GRAZING CAMPAIGN

### **Economic Facts of Public Lands Grazing**

Public lands grazers are a minority of livestock producers in the West and throughout the country...1

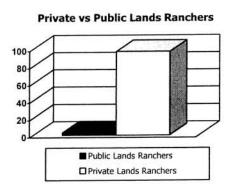
- Number of livestock producers with federal grazing permits: 27,000.2
- Percentage of livestock producers with federal grazing permits in the United States: 3%.3
- Percentage of livestock producers with federal grazing permits in eleven Western states: 22%.4
- Number of livestock producers without federal grazing permits: 880,000.5

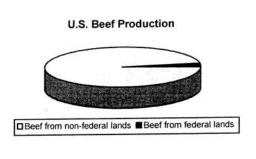
Subsidized by taxpayers, public lands grazers pay far less than market value for federal forage and grazing fees on comparable state and private lands...

- Fee to graze one cow and calf for one month (AUM) on federal public lands (2003): \$1.35.6
- Average fee per AUM on state lands in the West (excluding Texas) (1998): \$12.30.7
- Average fee per AUM on private lands in eleven Western states (1999): \$11.10.8

The forage provided, and the beef produced from federal public lands is insignificant...

- Percentage of total feed for livestock (cattle and sheep) in the United States supplied from federal lands: 2%.9
- Percentage of American beef produced from federal rangelands: less than 3%.10





National Public Lands Grazing Campaign (<u>www.permitbuyout.net</u> • <u>www.publiclandsranching.org</u>) Ver. 9/12/03

Federal grazing programs contribute very little to Western states' economies...

Aggregate Federal Grazing Statistics for Eleven Western States <sup>11</sup>	
Federal grazing-dependent jobs	17,989
Federal grazing-dependent jobs as percentage of total employment	0.06
Income from federal grazing-dependent jobs as percentage of total job income	0.04
Days of normal job growth to replace all federal grazing-dependent jobs	11
Days of normal income growth to replace all federal grazing-dependent jobs	

- In Nevada (the state with more federal land than any other outside of Alaska), federal public lands grazing provides 1,228 jobs. 12 By comparison, one casino in Las Vegas employs 37,000 people.
- Alternative uses of federal public lands contribute much more income to local and regional economies than livestock grazing. In the Central Winter Ecosystem Management Area in the Kaibab Plateau, Arizona, dispersed recreation is worth \$200,000 annually to the local and regional economies; fuelwood is worth \$48,984; livestock grazing is worth \$45,988; and deer and turkey hunting is worth \$1,324,259.

<sup>&</sup>lt;sup>1</sup> The vast majority of "livestock producers" on public lands are beef growers.

<sup>&</sup>lt;sup>2</sup> Grazing permits for BLM and Forest Service allotments; includes sheep growers; accounts for permittees who operate on both BLM and Forest Service allotments. USDI-BLM, USDA-Forest Service. 1995. Rangeland Reform '94 Final Environmental Impact Statement. USDI-BLM. Washington, DC: 3; see also Rogers, P. 1999. Cash cows. San Jose Mercury News (Nov. 7, 1999): 2S (reporting 26,300 permittees on BLM and Forest Service allotments).

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12 T. Power: 1996, LOST LANDSCAPES AND FAILED ECONOMIES: THE SEARCH FOR A VALUE OF PLACE. Island Press. Washington, DC: 184-185 (table 8-2).

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<sup>&</sup>quot;Souder, J. 1997. How does livestock grazing fit into the larger societal uses of wildlands? in PROC. SYMP. ON ENVIRONMENTAL.

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### NATIONAL PUBLIC LANDS GRAZING CAMPAIGN

### Livestock Versus Wildlife

### Grazing Competition with Wildlife

### **Forage Allocation**

In one study, scientists found that domestic livestock grazing consumed 88.8 percent of the available forage (cattle and [domesticated] horses 82.3 percent, free-roaming horses 5.8 percent, sheep 0.7 percent), leaving 11.2 percent to wildlife species (mule deer 10.1 percent, pronghorn 0.9 percent, bighorn sheep 0.1 percent, elk 0.1 percent).

#### Forage Use

 It is a simple concept: forage (grass, forbs [wildflowers], shrubs) consumed by domestic livestock is not available as food and cover for native wildlife-species that are important to healthy ecosystems, admired by wildlife enthusiasts, and prized by hunters. Range managers use the rather imprecise animal unit month or AUM to measure and allocate forage. An AUM is the amount of forage necessary to sustain a cow and calf for one month (approximately 650 pounds, although some estimates are more, between 800-1000 pounds<sup>2</sup>). Below are generally accepted AUM equivalents.

Native Wildlife	Animals Per AUM <sup>3</sup>	Domestic Livestock	Animals Per AUM 4
Bighorn Sheep	6.9	Cow	1
Pronghorn	10.8	Bull	1.25
Mule Deer	7.8	Horse	1.25
Elk	2.1	Goat	5
Bison	0.8	Sheep	5
Moose	1.2		

- The threatened desert tortoise eats less vegetation in one year than a cow eats in one day.5
- Percentage of prairie dog towns eliminated for ranching in the 20th century: 98 percent. 6
- Number of species, including ferrets, hawks, owls, mice and snakes, dependent on prairie dogs and their burrows: 170.

National Public Lands Grazing Campaign (www.permitbuyout.net • www.publiclandsranching.org) Ver. 9/3/03

#### Predator Control to Protect Livestock

Predators Killed by USDA Wildlife Services FY1999 8		
Animal	Number	
Coyote	85,938	
Fox	6,182	
Bobcat	2,435	
Badger	601	
Black bear	359	
Mountain lion	347	
Total	95,862	

Percent of cattle and calf losses attributed to predation (1995): 2.7 percent.9

Percent of cattle and calf losses attributed to digestive problems, respiratory difficulties, calving complications, weather and other causes (1995): 97.3 percent.1

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<sup>2</sup> GAO. 1988. Public rangelands: some riparian areas restored but widespread improvement will be slow. RCED-88-105. General

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<sup>&</sup>lt;sup>6</sup> Baskin, Y. 1997. THE WORK OF NATURE: How the DIVERSITY OF LIFE SUSTAINS US. Island Press. Washington, DC: 165.

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9 USDA-NASS, 1996, 1995 cattle and calf losses valued at \$1.8 billion, USDA-National Agricultural Statistics Service, Agricultural

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livestock are killed by domesticated dogs than mountain lions, bobcats, bears, and wolves, combined.

10 USDA-NASS. 1996. 1995 cattle and calf losses valued at \$1.8 billion. USDA-National Agricultural Statistics Service, Agricultural Statistics Board. (released May 17, 1996). Available at http://usda.mannlib.comell.edu/reports/nassr/livestock/pct-bbpl/.

### NATIONAL PUBLIC LANDS GRAZING CAMPAIGN

### Livestock and Water

Livestock grazing has damaged 80 percent of the streams and riparian ecosystems in the arid West.1

"Extensive field observations in the late 1980s suggest riparian areas throughout much of the West were in the worst condition in history."  $^{2}$ 

Although they represent only 0.5 to 1 percent of the surface area of federally owned Western arid lands, <sup>3</sup> riparian zones are critically important to over 75 percent of terrestrial species in southeastern Oregon and southeastern Wyoming, and 80 percent of wildlife in the Arizona and New Mexico. <sup>4</sup>

"Improvident grazing...has been the most potent desertification force, in terms of total acreage [affecting 225 million acres $^5$  or 351,562 square miles], within the United States."  $^6$ 

Nearly all surface waters in the West are fouled with livestock wastes that produce harmful waterborne bacteria and protozoa such as Giardia.<sup>7</sup>

### Belsky, et al. reviewed grazing impacts on water quality and quantity...8

- Water quality: livestock deposit pathogenic bacteria into streams and increase nutrient content, water turbidity, and water temperatures, all of which harm cold water fish and other species.
- Stream channel morphology: grazing results in streambank downcutting that shrinks the channel, and reduces streambank stability and the number and quality of deep pools and stream meanders.
- Hydrology (stream flow patterns): grazing causes increased runoff, flood water velocity, number of flood events, and peak flow, while reducing (or stopping) summer flow and lowering the water table.
- Riparian soils: grazing exposes bare ground, compacts soil and causes erosion, while reducing water infiltration and soil fertility.
- Streambank vegetation: grazing reduces the cover, biomass, and productivity of herbaceous and woody vegetation, and impedes plant succession.
- Instream vegetation: grazing increases algal populations while causing declines in other, beneficial water plants.
- Aquatic and riparian wildlife: grazing reduces the diversity, abundance, and productivity of cold water fish, amphibians, reptiles and invertebrates and alters the composition and diversity of birds and mammals.

National Public Lands Grazing Campaign (<u>www.permitbuyout.net • www.publiclandsranching.org</u>)

Ver 9/3/03

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<sup>&</sup>lt;sup>1</sup> Belsky, A. J., A. Matzke, S. Uselman. 1999. Survey of livestock influences on stream and riparian ecosystems in the western

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### Roads Open Up Paths for Weed Invasions

**DAVIS, California,** April 18, 2003 (ENS) - Two new studies find that roads have a considerable impact on the spread of invasive species. The studies, conducted by researchers at the University of California at Davis (UC Davis), find that improved roads in wilderness areas spread more invasive weeds than primitive roads and that roadless areas act as refuges for native species against invasions.

Invasive weeds such as cheatgrass and knapweeds have settled on some 125 million acres of the American West - the studies document that roads promote invasion because vehicles can transport non-native seeds into uninfested areas, and disturbed roadsides give weed seeds a place to grow.

"These papers are timely in light of the debate concerning protection for roadless habitats in U.S. national forests," said Jonathan Gelbard, a UC Davis doctoral candidate and coauthor of both studies. "Our findings show that roadless habitats have multiple benefits, not just for the environment, but also for the economy and our quality of life."

"They are not only refuges for native biodiversity," Gelbard explained, "but also protect against non native weed invasions, which are costly for ranchers and public agencies."

One of the UC Davis studies, published in the April issue of "Conservation Biology," is an examination of 42 roads in and around Utah's Canyonlands National Park. Gelbard and research ecologist Jayne Belnap of the U.S. Geological Survey found that each step of road improvement converted an increasing area of natural habitat to roadside habitat, from which non-native weeds spread into adjacent natural ecosystems.

The second study, published by Gelbard and UC Davis professor of environmental science and policy Susan Harrison in the April issue of the journal Ecological Applications, explores the effects of roads on inland California foothill grasslands.

It found that that in areas with typical grassland soils, non-native plants were less abundant and native plants more abundant at sites about a half-mile from roads compared to sites less than 33 feet from roads.

NPSPlanning Page 1 of 3

This is a Comment File Created on 08/11/2003 This Comment was Created on 08/20/2003

Name: Curt Bradley Address: PO box 710

City: Tucson State: AZ Zip: 85702

Telephone: 520 623 5252

Email: cbradley@biologicaldiversity.org

Comments: Re: Draft Environmental Impact Statement/General Management Plan for Coronado National Memorial I support Alternatives B and C that include the removal of livestock grazing from the memorial. I have hiked in this area and believe that livestock grazing is incompatible with the recreational opportunities afforded by it. Livestock grazing removes vegetation that is important for wildlife and thus diminishes wildlife viewing opportunities. Because this area is an important wildlife corridor, I strongly believe that livestock grazing should be ended on the monument.

### This Comment was Created on 08/22/2003

Name: Martin Taylor Address: PO Box 710

City: Tucson State: AZ Zip: 85702 Telephone:

Email: mtaylor@biologicaldiversity.org

Comments: On behalf of the Center for Biological Diversity and our 7,500+ members in the western US, I am submitting the following comments regarding the Coronado N.M. general management plan draft EIS. The Center agrees that the grazing of livestock on the memorial is inconsistent with the development of the monument for recreational purposes as originally forseen in the enabling Act. The Center therefore supports B or C to the extent that impacts to natural and cultural resources of recreational developments are truly minimized. The Center agrees that restoring the memorials grasslands to the condition seen by Coronado on his expedition is an central purpose of the memorial. This can only be achieved by ending livestock grazing. There were no livestock when Coronado passed through and early reports suggest that southern Arizona grasslands were lush and diverse before the destructive impact of livestock degraded them to the present poor condition. Livestock conflict with the recreational mission. Our members report having their recreational experience on the memorial impaired by the presence of livestock, their manure, bare soil and flies, livestock activities and developments such as ubiquitous fencing, corrals, stocktanks and "developed" springs. None of this is compatible with the mission of restoring the area to its condition at the time of the Coronado Expedition. Coronado undoubtedly also saw an abundance of wild game. Restoring wild game to pristine levels should likewise be considered part of the memorial's mission. Any recreational development should be done so as minimize the disruptive presence of human visitors. Interpretive developments are of great value in this respect to make sure that the public is educated as to the need for strict regulation to protect memorial values. There should be no off-road vehicle use permitted in the monument, not even on roads. These vehicles are noisy and polluting. They are destructive and unnecessary for enjoyment of the Memorial's values. They frighten wildlife and disturb other visitors. Vehicle access should be kept highly restricted to the single main road and parking lots, to ensure that visitation is minimally disruptive to the historic aura, peace and grandeur of this distinctive place. Sincerely Martin Taylor, Ph.D. Conservation Biologist Se habla español Center for Biological Diversity Centro de Diversidad Biologica www.biologicaldiversity.org Tucson AZ (main office) PO Box 710, Tucson AZ 85702, USA Buxton NC ~ Berkeley CA~ Idyllwild CA ~ Phoenix AZ Portland OR ~ San Diego CA ~ Sitka

NPSPlanning Page 2 of 3

AK ~ Silver City NM Protecting endangered species and wild places through science, policy, education, and environmental law Protegiendo especies en peligro y lugares naturales por sciencia, política, educación y derecho ambiental. Email:- mtaylor@biologicaldiversity.org Tel:- (520) 623 5252 ext 307 Fax:- (520) 623 9797

### This Comment was Created on 08/25/2003

Name: tim lengerich Address: POB 111

City: ajo State: az Zip: 85321 Telephone:

Email: timlengerich@hotmail.com

Comments: Please choose Plan B for the Monument plan. No cows!! There is a god, at last.

### This Comment was Created on 10/03/2003

Name: Alexander "Sandy" Kunzer Address: 4969 S. Laredo Pass

City: Sierra Vista State: AZ Zip: 85650

Telephone: (520) 803-8490 Email: sbkunzer@theriver.com

Comments: Ladies and Gentlemen, I have reviewed the Draft General Managent Plan/Environmental Impact Statement, worked as a volunteer in the Memorial for over 2 years, entered all of the public access areas in the Memorial and based on these activities, fully support the implementation of Alternative B (Prefered Alternative) for future management of the Memorial. This support is given even though I have I have reservations about the EIS, finding it incomplete and incorrect in places even with the tremendous and conciencious effort that is obvious in its preparation. Thank you for this opportunity to comment. Alexander "Sandy" Kunzer

### This Comment was Created on 10/06/2003

Name: Steve Saway

Address: 533 Suffolk Drive

City: Sierra Vista

State: AZ Zip: 85635

Telephone: 520-459-8959 Email: stevesaway@excite.com

Comments: Dear sir: I concur with selection of alternative B for the General Management Plan for Coronado National Memorial. I believe it best strikes a balance between protection of the Memorial's resources while enhancing visitor educational and recreational opportunities. I am glad to see the development of additional hiking trails and believe this will help the Memorial support the growing number of visitors who desire to experience the Memorial in its natural environment. I would like to recommend one additional area for

NPSPlanning Page 3 of 3

consideration. The Memorial currently has no area designated for dispersed overnight camping. However, due to the fact that the southern entry point for the Arizona Trail begins in the Memorial, it would be desirable for long distance hikers to have an area to camp before beginning their journey. Even if this could only be done with a permit based process, it would fill a definite need. Thank you for the opportunity to submit these comments. Steve Saway 533 Suffolk Drive Sierra Vista, AZ 85635

y

August 28, 2003

1922 E. Orion Street Tempe, AZ 85283

Mr. Dale Thompson, Superintendent Coronado National Memorial 4101 E. Montezuma Canyon Road Hereford, AZ 85615

Dear Mr. Thompson,

I am writing to submit comments on your draft environmental impact statement/general management plan (EIS/GMP).

I support the implementation of your preferred alternative, Alternative B, primary because it would end livestock grazing on the Memorial. While your recently completed Livestock Management Plan will ensure that cattle grazing is better managed, if it continues, the Memorial's natural resources will recover more quickly without any grazing at all. Furthermore, even the best livestock management plan cannot completely eliminate the negative ecological impacts of grazing in an arid place like the Memorial. Since livestock are currently permitted to graze on adjacent Forest Service lands, the termination of grazing on the Memorial could also serve to show a comparison between the two types of land management.

One more thing. When Coronado traveled through this area in the 1540's, there was no livestock grazing, other than the animals he was dragging along with him.

Thank you for this opportunity to participate.

Jeff Burgess

Ph 602-417-4486 (day)

Superintendent Coronado National Memorial 4101 East Montezuma Canyon Road Hereford, AZ 85615



Re: L7615

Dear Superintendent Thompson.

The draft Environmental Impact Statement/General Management Plan for Coronado National Memorial has been received.

I went into shock and had two sleepness nights after I noticed that you spent \$ 6.05 to mail it to me and probably to hundreds of others also. I wish I had that kind of money to take my bad left knee to the doctor. Please take me off your mailing list for anything that costs more than 37 cents.

I like that under your preferred alternative B live stock grazing will be discontinued in the memorial. Please do not change your mind on this nor give in to the pressure from the pro life stock grazing lobby!

I would like to see recycling bins and actual recycling, particularly of glass and plastic bottles when the visitor center will be rehabilitated and new pullouts and waysides provided with garbage cans.

Sincerely

Dieter Kamm

4393 Plaza Oro Loma

Sierra Vista, Arizona 85635

August 4, 2003

Please address your comments to Superintendent, Coronado National Memorial, 4101 East Montezuma Canyon Road, Hereford, AZ 85615, or Telephone: (520) 366-5515. The document will be available on the Internet in the NPS planning website at: http://planning.nps.gov/plans.cfm. Comments may be sent to the website that will include an automated public response form. Finally you may hand-deliver your comments to park headquarters, 4101 East Montezuma Road, Hereford, AZ.

For information or questions concerning the GMP, call the Superintendents Office at the telephone number listed above.

We thank you in advance for your attention and we appreciate your concern for the future of Coronado National Memorial.

Sincerely,

DaleThompson

Superintendent

I am voting for afternature C.

I believe the priority should definitly
be an conserving natural and cultural
resources. There is always time
to make other changes in the
future of necessary; if making as
little change as passible now. Whereas,
little change as passible now. Whereas,
having lots of the Changes suggested
making lots of the Changes suggested
in the other alternatives evoued
in the other alternatives evoued
in the world be no going
back'
saving paper by printing back to back'
saving spaper by printing back to back'
resources as well for considering
resources as well for considering
all the enjout ofour are asking
to of the community of the considering

Warren K. North and Barbara L. North 516 Raymond Drive Sierra Vista, AZ 85635

August 6, 2003

Superintendent Coronado National Memorial 4101 East Montezuma Canyon Road Hereford, AZ 85615

Reference: L7615

Attention: Dale Thompson, Superintendent,

Thank you for asking us to comment on the draft Environmental Impact Statement/General Management Plan for Coronado National Memorial.

We believe grazing in the memorial should be ended.

Alternative B would be our choice.

Our experiences include some exciting events in remote places on government lands. We believe you might want to take account of responsible estimates of increases in cross border traffic in coming years. Building new facilities in very remote locations might place isolated personnel at risk.

Bushace Nasel

We wish you well in your reconstruction efforts,

Very truly yours,

Warren north

Warren and Barbara North